

**BEFORE THE JUDICIAL PANEL  
ON MULTIDISTRICT LITIGATION**

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IN RE: BAIR HUGGER  
PRODUCTS LIABILITY LITIGATION

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MDL- 2666

**NOTICE OF POTENTIAL TAG-ALONG ACTION**

Pursuant to Rule 7.1(a) of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation (the “Rules”), Plaintiff Emma Mann, by and through the undersigned counsel, hereby gives notice to the Clerk of the Judicial Panel on Multidistrict Litigation (“the Panel”) of a “tag-along” action as defined in Panel Rule 1.1(h) that was filed in the United States District Court for the Middle District of Georgia, and styled as *Mann v. 3M Company*, Case No. 7:15-cv-00208(WLS) A Schedule of Actions, a file-stamped copy of the Case Docket Sheet, and a file-stamped copy of the Complaint in this case are all attached hereto.

The tag-along action at issue shares common questions of fact with cases already transferred under Section 1407 and now part of the Multidistrict Litigation, MDL-2666. Specifically, Plaintiff Emma Mann alleges she has suffered injuries as a result of use of the Bair Hugger device that was manufactured by Defendant 3M Company, which is at issue in MDL-2666.

Defendant 3M has answered the complaint in the *Mann* case. No discovery has been taken.

Based on the foregoing, Plaintiff Emma Mann respectfully requests that the Panel transfer this tag-along action under Section 1407 to the United States District Court for the District of Minnesota, and consolidate it with the other actions pending in MDL-2666.

Respectfully submitted this 14<sup>th</sup> day of December, 2015.

/s/ Richard R. Schlueter

Richard R. Schlueter

Georgia Bar No. 629420

[rschlueter@cssfirm.com](mailto:rschlueter@cssfirm.com)

Childers, Schlueter & Smith, LLC

1932 N. Druid Hills Road

Suite 100

Atlanta, Georgia 30319

Tel. (404) 419-9500

Fax (404) 419-9501

**CERTIFICATE OF SERVICE**

I hereby certify that on December 14, 2015, a copy of the foregoing NOTICE OF POTENTIAL TAG-ALONG ACTION was filed electronically with the Clerk of the Court for the Judicial Panel on Multidistrict Litigation using the CM/ECF System. Notice of this filing will be sent to all counsel of record registered to receive by electronic service by operation of the court's electronic filing system, and by electronic and U.S. Mail to counsel for Defendant 3M Company, addressed as follows:

Dara D. Mann, Esq.  
Dentons US LLP  
303 Peachtree Street, NE  
Suite 5300  
Atlanta, Georgia 30309-3534  
[Dara.mann@dentons.com](mailto:Dara.mann@dentons.com)

Jerry W. Blackwell, Esq.  
Mary S. Young, Esq.  
Blackwell Burke P.A.  
431 South 7<sup>th</sup> Street  
Suite 2500  
Minneapolis, MN 55415  
[Blackwell@blackwellburke.com](mailto:Blackwell@blackwellburke.com)  
[myoung@blackwellburke.com](mailto:myoung@blackwellburke.com)

/s/ Richard R. Schlueter  
Richard R. Schlueter  
Georgia Bar No. 629420  
[rschlueter@cssfirm.com](mailto:rschlueter@cssfirm.com)  
Childers, Schlueter & Smith, LLC  
1932 N. Druid Hills Road  
Suite 100  
Atlanta, Georgia 30319  
Tel. (404) 419-9500  
Fax (404) 419-9501